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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

SAM BENFORD,

Plaintiff,

vs.

STERLING MACHINERY AUCTIONS
LLC; DEBRA LOUISE MATTES, AS
TRUSTEE OF THE DEBRA MATTES
LIVING TRUST; and DOES 1 to 10,

Defendants.

Case No.: 2:25-cv-06630-ODW (MBKx)

DECLARATION OF PLAINTIFF IN
SUPPORT OF PLAINTIFF'S OSC
RESPONSE RE: SUPPLEMENTAL
JURISDICTION

DECLARATION OF PLAINTIFF

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3 1. I am the Plaintiff in this matter and, in that capacity, am familiar with the
4 contents herein and if called and duly sworn, could competently testify to them.

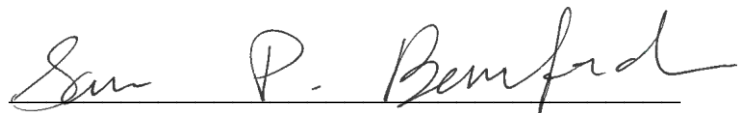
5 2. I have filed a total of more than 10 complaints alleging a construction-
6 related accessibility violation within the 12-month period immediately preceding the
7 filing of the current complaint, which alleges a construction-related accessibility
8 violation.

9 3. In the filing of these complaints, I have not been the client of a qualified
10 legal services project or a qualified support center, as defined in section 6213 of the
11 California Business and Professions Code.

12 4. It is, therefore, my understanding that I qualify as a high-frequency litigant
13 as that term is used by California law.

14 5. I declare under penalty of perjury of the laws of the State of California and
15 the United States that the foregoing is true and correct to the best of my knowledge.
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17 I declare under penalty of perjury under the laws of the United States and the laws
18 of the State of California that the foregoing is true and correct. Executed on August 15,
19 2025, at Los Angeles, California.

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